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March 21, 2019

Marlene Dortch
Secretary
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

Re: *The Uniendo a Puerto Rico Fund and the Connect USVI Fund*, WC Docket Nos. 18-143, 10-90, 14-58; Notice of *Ex Parte* Presentation

Dear Ms. Dortch,

On March 19, 2019, Mary Henze and the undersigned of AT&T Services, Inc. (AT&T) met with Garnet Hanly, Charles Mathias, Dana Shaffer, and Ziad Sleem of the Wireless Telecommunications Bureau, Dan Kahn, Alex Minard, and Dangkhoea Nguyen of the Wireline Competition Bureau, and Pramesh Jobanputra of the Office of Economics and Analytics to discuss the Notice of Proposed Rulemaking in the Uniendo a Puerto Rico Fund and the Connect USVI Fund proceeding. AT&T's advocacy in this meeting was consistent with the positions set forth in its comments filed on July 26, 2018¹ and *ex parte* letter filed on December 13, 2018.²

Specifically, AT&T urged the Commission to move expeditiously to adopt its proposed Uniendo a Puerto Rico Fund and Connect USVI Fund Stage 2 funding for mobile providers (Stage 2 Mobility Fund) with some modifications. In particular, AT&T recommended that the Commission allocate funding between the territories based on Census Bureau population figures and not based on the legacy amounts each territory received pre-hurricanes. As the Commission understands, those legacy amounts were tied to its long-obsolete identical support rule. Additionally, AT&T supports disbursing *all* Stage 2 Mobility Fund support amounts among mobile providers within each jurisdiction based on their FCC Form 477 filings.

AT&T also urged the Commission to reject its proposal to impose Mobility Fund Phase II (MFII) service obligations on Stage 2 fund recipients. AT&T noted that the Commission has not yet finalized all of the MFII obligations and procedures. Additionally, MFII service requirements are designed for a 10-year service term. By contrast, the proposed Stage 2 Mobility Fund has a significantly shorter 3-year timeframe and is tailored to two jurisdictions where recovery efforts following the 2017 hurricane season remain underway.

AT&T also urged the Commission not to adopt resiliency requirements in this proceeding that are specific to Stage 2 Fixed Fund and Mobility Fund recipients. We noted that the Commission is considering these issues in other dockets and that it would be appropriate and sufficient to apply whatever

¹ Comments of AT&T, WC Docket No. 18-143 (filed July 26, 2018).

² Letter from Raquel Noriega, AT&T, to Marlene Dortch, FCC, WC Docket No. 18-143 (filed December 13, 2018).



decisions are reached in those proceedings to recipients of the proposed Uniendo a Puerto Rico Fund and the Connect USVI Fund.

Please contact me if you have any questions related to these matters.

Sincerely,

/s/

Raquel Noriega

cc:

Garnet Hanly WTB
Charles Mathias WTB
Dana Shaffer WTB
Ziad Sleem WTB
Dan Kahn WCB
Alex Minard WCB
Dangkhoa Nguyen WCB
Pramesh Jobanputra OEA